

ICC Docket No. 07-0540

Commonwealth Edison Company's Response to
NRDC's (NRDC) Data Requests 1-1 - 1-11

Dated: December 28, 2007

REQUEST NO. NRDC 1-1:

Regarding Exhibit 7.0, lines 258-278:

- a) What percent of ComEd's overall forecasted savings are based on savings from Database of Energy Efficiency Resources ("DEER") measures?
- b) What percent of the deemed measures that ComEd proposes are based on DEER values?
- c) For measure savings that ComEd used that did not come from DEER, did high-rigor evaluation, measurement and verification ("EM&V") studies form the basis of the measure savings values?
- d) For measure savings ComEd used that did not come from DEER, from what jurisdictions were the savings values derived?

RESPONSE:

Person responsible for response

Nicholas Hall, TecMarket Works

- a. See ComEd's response to Request No. NRDC 1-6.
- b. See ComEd's response to Request No. NRDC 1-6.
- c. ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states as follows. See ComEd's response to Request No. NRDC 1-9.
- d. ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states as follows. See ComEd's response to Request No. NRDC 1-9.

OFFICE FILE
ICC Docket No. 07-0540
NRDC X
1.0
11/4/08

EEDR 0016204

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to
NRDC's (NRDC) Data Requests 1-1 - 1-11**

Dated: December 28, 2007

REQUEST NO. NRDC 1-2:

Regarding lines Exhibit 7.0, lines 220-245 and Exhibit 13.0, lines 37-47:

- (a) Has Mr. Hall reviewed the savings values for the weather-sensitive measures that Commonwealth Edison proposes?
- (b) If the answer to a) is "Yes," does Mr. Hall believe that the savings values for the weather-sensitive measures that ComEd proposes are reasonable?
- (c) Does Mr. Hall believe that savings values for the weather-sensitive measures can be improved through *ex post* EM&V studies?
- (d) Did Mr. Hall's review ComEd's proposed measures savings for heating, ventilation and air conditioning ("HVAC") measures?
- (e) If the answer to d) is "Yes," did ComEd take into account humidity in establishing savings for HVAC measures?
- (f) If the answer to e) is "Yes," how did ComEd take into account humidity in establishing savings for HVAC measures?

RESPONSE:

Person responsible for response

Nicholas Hall, TecMarket Works

- a. Yes.
- b. Yes.
- c. Yes.
- d. Yes.
- e. See ComEd's response to Request No. NRDC 1-7.
- f. See ComEd's response to Request No. NRDC 1-7.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to
NRDC's (NRDC) Data Requests 1-1 - 1-11**

Dated: December 28, 2007

REQUEST NO. NRDC 1-3:

Regarding Exhibit 7.0, lines 300-308, and Exhibit 13.0, lines 230-249:

- (a) Are the compact florescent light bulb ("CFL") savings and net-to-gross values ComEd proposes from DEER?
- (b) Is Mr. Hall familiar with the study, prepared by Itron, titled "2004/2005 Statewide Residential Retrofit Single-Family Energy Efficiency Rebate Evaluation," dated October 2, 2007 (available at http://ftp.cpuc.ca.gov/puc/energy/electric/energy+efficiency/ee+workshops/cpuc-id_1115-04_2004-2005_sfeer_eval_report.pdf) ("Itron Study")?
- (c) Does Mr. Hall believe the results of the Itron Study will be used to modify the savings values for CFLs in DEER during the next DEER update?
- (d) Does Mr. Hall believe that ComEd should use "deemed" CFL savings values consistent with the Itron Study?
- (e) If the answer to c) is "No," why not?

RESPONSE:

Person responsible for response

Nicholas Hall, TecMarket Works

- a. See ComEd's response to Request No. NRDC 1-11.
- b. ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, ComEd states as follows. Yes.
- c. ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, ComEd states as follows. Mr. Hall believes that the study referenced in subpart (b) of this request may be used as one of the information sources for any modifications of the savings values for CFLs in DEER.

d. ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Further, ComEd objects to this request as overbroad, vague and ambiguous. Without waiving these objections, ComEd states as follows. No.

e. ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Further, ComEd objects to this request as overbroad, vague and ambiguous. Without waiving these objections, ComEd states as follows. The study referenced in subpart (b) of this request provides only one data point collected in California, a market that has been implementing and promoting energy efficiency programs for many years, and in which free riders are much more prevalent. As stated in his rebuttal testimony, Mr. Hall agrees with AG witness Mr. Mosenthal that "it is reasonable to deem savings where there is a great deal of certainty about savings from past studies." (ComEd Ex. 13.0, p. 7 (citing AG Ex. 1.0, p. 28).) Therefore, it would not be appropriate for the Commission to deem CFL savings values in Illinois based solely on the results of this report.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to
NRDC's (NRDC) Data Requests 1-1 - 1-11**

Dated: December 28, 2007

REQUEST NO. NRDC 1-4:

Regarding Exhibit 7.0, lines 205-217, and Exhibit 13.0 lines 30-33; 73-90:

- (a) Does Mr. Hall believe that the 3% evaluation budget should be used for process evaluations and impact evaluations or just impact evaluations?
- (b) If Mr. Hall believe that the 3% evaluation budget should be used only for impact evaluations, and not process evaluations, please describe his rationale?
- (c) Does Mr. Hall believe that if the utilities hire an independent EM&V contractor, no other steps are needed to assure independence of the EM&V process?
- (d) If Mr. Hall believe other steps are needed to assure independence of the EM&V process (besides hiring an independent evaluator) please list what they are.
- (e) If the answer to sub part d) is "Yes," please provide the basis for the response.

RESPONSE:

Person responsible for response

Nicholas Hall, TecMarket Works

- a. ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states as follows. As stated in his rebuttal testimony, Mr. Hall believes that "[i]t would be wise [] to focus the evaluation budget for ComEd's proposed Plan on program-level impact evaluations." (ComEd Ex. 13.0, p. 5.)
- b. ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states as follows. As stated in his rebuttal testimony, Mr. Hall believes that that "[i]t would be wise [] to focus the evaluation budget for ComEd's proposed Plan on program-level impact evaluations" because of "the current funding level in Illinois for EM&V activities." (ComEd Ex. 13.0, p. 5.)
- c. ComEd objects to this request on the grounds that it is argumentative. Without waiving this objection, ComEd states as follows. No.
- d. ComEd objects to this request as overbroad, vague and ambiguous. Without waiving

this objection, ComEd states as follows. *See* ComEd Ex. 1.0, pp. 13-14 & 114-19; Ex. 2.0, pp. 42-45.

e. Not applicable.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to
NRDC's (NRDC) Data Requests 1-1 - 1-11**

Dated: December 28, 2007

REQUEST NO. NRDC 1-6:

Regarding Exhibit 6.0, lines 127-147, 156-168 and 772-785:

- (a) What percent of ComEd's overall forecasted savings are based on savings from Database for Energy Efficiency Resources ("DEER") measures?
- (b) What percent of the deemed measures that ComEd proposes are based on DEER values?

RESPONSE:

Person responsible for response

Val Jensen, ICF International

(a) The vast majority of non-weather-sensitive per measure savings values within the Residential Solutions and Business Solutions programs in ComEd's Energy Efficiency and Demand Response Plan ("Plan"), with the exception of those associated with standard T8 technology and commercial food service equipment, were taken from the DEER database.

(b) See ComEd's response to subpart (a).

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to
NRDC's (NRDC) Data Requests 1-1 - 1-11**

Dated: December 28, 2007

REQUEST NO. NRDC 1-7:

Regarding Exhibit 6.0, lines 235-256 and 297-300:

- (a) When Mr. Jensen developed measure savings for weather sensitive measures, did he or ComEd consider humidity and how humidity can impact savings from weather sensitive measures?
- (b) If the answer to a) is "Yes," please describe how Mr. Jensen or ComEd considered humidity in developing measure-level savings for weather sensitive measures?

RESPONSE:

Person responsible for response

Val Jensen, ICF International

- (a) Yes.
- (b) See ComEd's response to Request No. NRDC 1-9 and subpart (a) of this request. The DOE-2 building energy simulation model used to develop estimates of weather-sensitive measure savings does calculate the effects of humidity on building energy use. Mr. Jensen is not familiar with the specific algorithms used to estimate the impacts of humidity on building energy use.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to
NRDC's (NRDC) Data Requests 1-1 - 1-11**

Dated: December 28, 2007

REQUEST NO. NRDC 1-9:

Regarding Exhibit 6.0, lines 148-153:

- (a) Please provide the full list of measures that ComEd evaluated for measure-level cost-effectiveness in Illinois. For the measure savings that did not come from DEER, please provide the following information:
 - (i) the source of the measure savings;
 - (ii) whether the measure savings were based on high-rigor evaluation, measurement and verification ("EM&V") studies;
 - (iii) the jurisdiction from which the measure savings come;
 - (iv) whether the measure savings were adjusted to reflect Illinois' temperature;
 - (v) whether the measure savings were adjusted to reflect humidity in Illinois and how adjustments were made to reflect Illinois humidity; and
 - (vi) whether the measures savings were adjusted to reflect any other Illinois-specific characteristics and, if so, describe the characteristics and how the adjustments were made.

RESPONSE:

Person responsible for response

Val Jensen, ICF International

- (i) See Appendix B to ComEd's Energy Efficiency and Demand Response Plan ("Plan"). (ComEd Ex. 1.0, Appendix B.)
- (ii) ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states as follows. See ComEd's response to subpart (c) of Request No. NRDC 1-1.

(iii) See Appendix B to ComEd's Energy Efficiency and Demand Response Plan ("Plan"). (ComEd Ex. 1.0, Appendix B.) Measure savings for weather-sensitive measures were estimated using the DOE-2 building energy simulation model.

(iv) ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states as follows. In the cases of weather-sensitive measures, yes.

(v) See ComEd's response to Request No. NRDC 1-7.

(vi) ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states as follows. See Appendix B to ComEd's Energy Efficiency and Demand Response Plan ("Plan"). (ComEd Ex. 1.0, Appendix B.)

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to
NRDC's (NRDC) Data Requests 1-1 - 1-11
Dated: December 28, 2007**

REQUEST NO. NRDC 1-11:

Regarding Exhibit 6.0, Table 4, Table 6, and Table 8: lines 704-718, and lines 240-242, 496-508, and Exhibit 12, lines 121-124:

- (a) Are the compact florescent light bulb ("CFL") savings and net-to-gross values ComEd proposes from DEER?
- (b) Is Mr. Jensen familiar with the study, prepared by Itron, titled "2004 – 2005 Statewide Residential Retrofit Single-Family Energy Efficiency Rebate Evaluation Final Report," dated October 2, 2007 (available at http://ftp.cpuc.ca.gov/puc/energy/electric/energy+efficiency/ee+workshops/cpuc-id_1115-04_2004-2005_sfeer_eval_report.pdf) ("Itron Study")?
- (c) Does Mr. Jensen believe the results of the Itron Study will be used to modify the savings values for CFLs in DEER during the next DEER update?
- (d) Does Mr. Jensen believe that ComEd should use "deemed" CFL savings values consistent with the Itron Study?
- (e) If the answer to c) is "No," why not?

RESPONSE:

Person responsible for response

Val Jensen, ICF International

- a) Yes.
- b) ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, ComEd states as follows. Yes, but only generally.
- c) ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, ComEd states as follows. See ComEd's response to Request No. NRDC 1-3.

d) ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, ComEd states as follows. See ComEd's response to Request No. NRDC 1-3.

e) ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, ComEd states as follows. See ComEd's response to Request No. NRDC 1-3.